

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Roosevelt Morgan Case No. 18-29896 Chapter 13

All Cases: Moving Creditor ICIB Investments, Inc. Date Case Filed 10/24/2019

Nature of Relief Sought: Lift Stay Annul Stay Other (describe) 12/13/2018

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed _____

Chapter 7: No-Asset Report Filed on _____
 No-Asset Report not Filed, Date of Creditors Meeting _____

1. Collateral

a. Home
b. Car Year, Make, and Model _____
c. Other (describe) 6349 S. Drexel Avenue, Chicago, Illinois 60637

2. Balance Owed as of Petition Date \$ 15,512.60
Total of all other Liens against Collateral \$ n/a

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$ 200,000.00

5. Default

a. Pre-Petition Default
Number of months _____ Amount \$ 15,512.60

b. Post-Petition Default

i. On direct payments to the moving creditor
Number of months _____ Amount \$ _____

ii. On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____

6. Other Allegations

a. Lack of Adequate Protection § 362(d)(1)

i. No insurance
ii. Taxes unpaid Amount \$ 1748.97~
iii. Rapidly depreciating asset
iv. Other (describe) First Installment of 2018 due in 2019 unpaid

b. No Equity and not Necessary for an Effective Reorganization § 362(d)(2)

c. Other "Cause" § 362(d)(1)

i. Bad Faith (describe) _____
ii. Multiple Filings
iii. Other (describe) First Installment of 2018 due in 2019 unpaid

d. Debtor's Statement of Intention regarding the Collateral

i. Reaffirm ii. Redeem iii. Surrender iv. No Statement of Intention Filed

Date: 04/18/2019 /s/Paul M. Bach
Counsel for Movant